

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ALABAMA
WESTERN DIVISION**

JANE DOE #1 and JANE DOE #2 on
behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

MG FREESITES, LTD, d/b/a
“PORNHUB”; MG FREESITES II,
LTD; MINDGEEK S.A.R.L.;
MINDGEEK USA INCORPORATED;
MG CY HOLDINGS LTD;
MINDGEEK CONTENT RT LIMITED;
9219-1568 QUEBEC, INC., d/b/a
MINDGEEK); MG BILLING LTD

Defendants.

CIVIL ACTION NO. 7:21-CV-00220

Honorable L. Scott Coogler

NOTICE OF CHANGE IN SUPPLEMENTAL AUTHORITY

Defendants MindGeek S.A.R.L., MG Freesites Ltd., MG Freesites II Ltd, MindGeek USA Inc., MG CY Holdings Ltd, MindGeek Content RT Ltd., 9219-1568 Quebec Inc., and MG Billing Ltd (collectively, “Defendants”) respectfully submit this Notice of Supplemental Authority in connection with Defendants’ Motion to Dismiss Plaintiffs’ First Amended Complaint (ECF 24) (“Pending Motion”), which is currently pending before the Court.

On September 17, 2021, after the Pending Motion was fully briefed, the United States District Court for the Central District of California issued a tentative order dismissing analogous claims. *See Jane Doe, et al. v. Reddit, Inc.*, Case No.

21-cv-00768-JVS-KES (C.D. Cal.). Defendants submitted this tentative order to the Court the same day. On October 7, 2021, the *Reddit* court entered a final Order Regarding Motion to Dismiss, Dkt. 58, No. 21-cv-00768-JVS-KES (C.D. Cal.), that is substantively identical to the previously submitted tentative order.

A true and correct copy of the Order Regarding Motion to Dismiss is attached as Exhibit A to this Notice. Defendants are also prepared to submit supplemental briefing concerning the order, should the Court determine that it would be helpful and appropriate.

DATED: October 12, 2021

Respectfully submitted,

/s/ Sara M. Turner

Sara M. Turner

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on October 12, 2021, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send notice of electronic filing to all counsel of record.

/s/ Sara M. Turner
Sara M. Turner